



April 14, 2015

Via Electronic Filing and FedEx

Public Utility Commission
Attn: Filing Center
3930 Fairview Industrial Drive SE
Salem, OR 97308

Re: Docket No. UM 1712: Sierra Club's Exhibit List and Cross Exhibits

Please find enclosed Sierra Club's Exhibit List and Cross Exhibits in the above-referenced docket.

The redacted version of this filing has been e-filed with the Commission and served upon parties via email. The confidential version of this filing is being filed with the Commission and served pursuant to Protective Order No. 14-431 upon all eligible party representatives via FedEx.

Please let me know if you have any questions. Thank you.

Respectfully submitted,

/s/ Derek Nelson

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cc: Service List

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of April, 2015, I caused to be served the foregoing SIERRA CLUB'S EXHIBIT LIST AND CROSS EXHIBITS upon all party representatives on the official service list for this proceeding via electronic mail. The confidential version of this filing is being served pursuant to Protective Order No. 14-431 upon all eligible party representatives via FedEx.

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Dated this 14th day of April, 2015 at San Francisco, CA.

/s/ Derek Nelson

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1712**

In the Matter of

PACIFICORP, dba PACIFIC POWER,
Application for Approval of Deer Creek Mine
Transaction

SIERRA CLUB’S EXHIBIT LIST AND
CROSS EXHIBITS

Sierra Club hereby files its list of pre-filed testimony, pre-filed exhibits, and cross exhibits. Sierra Club’s cross exhibit is attached.

Pre-Filed Testimony and Exhibits

SC 100	Confidential Revised Direct Testimony of Jeremy Fisher (Includes Errata)
SC 101	Curriculum Vitae of Jeremy I. Fisher, PhD
SC 102	Utah DEQ DAQ Planning Regional Haze
SC 103	2015 IRP Public Input Meeting 6
SC 104	Confidential Huntington Plant 2014 Strategic Planning Review
SC 105	Response to Sierra Club Data Request 1.27
SC 106	Wyoming Docket 20000-400-EA-11 Wyoming Docket 20000-400-EA-11 RMP Motion Requesting Permission to Withdraw Application
SC 107	Utah Docket 13-035-184 Exhibit RMP___(CAT-9)
SC 108	Response to ICNU Data Request 1.16 (Excerpt)
SC 109	Respond to Sierra Club Data Request 2.6

Cross Exhibits (Attached)

SC 200	Confidential 1st Revised Response to Sierra Club Data Request 1.31
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Sierra Club reserves the right to refer to or request to move into the record any cross exhibits provided by other parties in this proceeding.

Dated: April 14, 2015

Respectfully submitted,

/s/ Travis Ritchie

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**PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1712

REDACTED Exhibit Sierra Club/200

Redacted 1st Revised Response to
Sierra Club Data Request 1.31

The confidential version of this exhibit is provided under separate cover.

UM-1712/PacifiCorp
February 17, 2015
Sierra Club Data Request 1.31 – 1st Revised

Sierra Club Data Request 1.31

Has the Company ever considered the existence of a long-term take-or-pay contract as part of any economic analyses related to the installation of selective catalytic reduction (SCR) controls for the Hayden generating station? If so, how did the existence of a long-term take-or-pay contract influence the results of such an economic analysis?

Confidential 1st Revised Response to Sierra Club Data Request 1.31

This response replaces, in its entirety, the Company's original response dated January 28, 2015.

The Company objects to this request as not reasonably calculated to lead to discovery of admissible evidence. Without waiving this objection, the Company responds as follows:

Yes. If take-or-pay provisions were applicable under an early retirement scenario, the present value of revenue requirements differential (PVR(d)) comparing selective catalytic reduction (SCR) versus early retirement was reduced by approximately [REDACTED] with the reduction being less favorable to the SCR alternative. While the economic impact of coal contract take-or-pay provisions was reported in the Company's economic analysis, this analysis did not influence Company decisions regarding the SCR project at Hayden Unit 1.

The confidential information identified above is designated as confidential under Order No. 14-431 and may only be disclosed to qualified persons as defined in that order.